

# Exhibit A

**DECLARATION OF BRENNAN GIAN-GRASSO**  
**ATTORNEY FOR A.S.R.**

I, Brennan Gian-Grasso, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct to the best of my knowledge and belief:

1. I am a founding partner at Gian-Grasso & Tomczak Immigration Law Firm in Philadelphia, Pennsylvania. My practice focuses on removal defense in both detained and non-detained context. I represent A.S.R. in his immigration proceedings.
2. A.S.R. is currently detained at the Immigration and Customs Enforcement (“ICE”) Moshannon Valley Processing Center in Philipsburg, Pennsylvania, which is owned and operated by GEO Group, Inc.
3. A.S.R. is a citizen of Venezuela who was born in 1995. He entered the United States through Texas in November 2023 with his wife, his child, and two stepchildren. He was released and moved to New York City, then Philadelphia.
4. Prior to his detention, A.S.R. had lived in Philadelphia since December 2024, where he established himself as a respected member of the community. He regularly attended church and worked as a construction worker.
5. A.S.R. was not initially under the Intensive Supervision Appearance Program (“ISAP”). His wife was placed in the program at entry. She checked in without any issue from her entry through today. But on February 26, 2025, A.S.R. was asked to come in so he could be put on the program as well. A.S.R. had no issue with this and attended. He was arrested at this ISAP appointment. ICE officers told A.S.R. that his neighbor had reported that he is a member of Tren de Aragua. ICE officers also asked him about his tattoos. A.S.R. has 3 tattoos—one tattoo is his mother’s name, another his grandmother’s name, and the last one is the word “family.” None are related to Tren de Aragua. ICE also filed an I-213 accusing A.S.R. of being affiliated with Tren de Aragua.
6. Following his arrest by ICE, A.S.R. has been detained at Moshannon Valley Processing Center in Pennsylvania. A.S.R. is in pending immigration removal proceedings. A.S.R. fears returning to Venezuela and has sought asylum, withholding of removal, and protection under the Convention Against Torture. He owned a store in his hometown in Venezuela and was extorted by groups associated with the Maduro regime. He is scheduled for an immigration hearing on April 15, 2025 in Elizabeth Immigration Court.

7. A.S.R. vehemently denies any connection to Tren de Aragua. In preparation for A.S.R.'s immigration proceedings, I have spoken with his boss and a close friend who similarly vouch for his lack of connection to the gang.
8. A.S.R. has only encountered law enforcement once in the United States. While in a migrant shelter in New York, A.S.R. was involved in a family dispute on December 10, 2023. His stepson hit A.S.R.'s wife; A.S.R. responded by hitting his stepson in the nose. A.S.R. was arrested and released on the same day. At A.S.R.'s first court appearance, the case was transferred to family court, which assigned the case to family mediation. A.S.R. successfully completed the family mediation requirements, including mandatory family therapy sessions and anger management classes. Charges were dismissed and sealed by March 2024.
9. I have searched and have not found any criminal records for A.S.R. in the United States, beyond the dismissed charges in New York. I am unaware of any criminal history in Venezuela and A.S.R. adamantly denies that he has any criminal contacts there.
10. I am aware from news reports that on March 15, 2025, ICE transferred a group of Venezuelan men and flew them to the Terrorism Confinement Center ("CECOT") in El Salvador. Based on knowledge and belief, there were people in that group who were similarly situated to A.S.R. It appears to me that A.S.R. is at grave risk of ICE alleging that he is removable under the Alien Enemies Act as a member of Tren de Aragua.

I, Brennan Gian-Grasso, swear under penalty of perjury that the forgoing declaration is true and correct to the best of my knowledge and recollection.

\_\_\_\_s/Brennan Gian-Grasso \_\_\_\_

Brennan Gian-Grasso

Executed this 14th day of April, 2025